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## INTRODUCTION

This report summarizes public responses to the Proposed Rule and Notice of Intent by the U.S. Department of Interior (USDI) and the Fish and Wildlife Service (FWS) to re-evaluate the Record of Decision and remove the regulations on the Reintroduction of Grizzly Bears into the Bitterroot Area of Idaho and Montana.

The Proposed Rule was published in the June 22, 2001 issue of the Federal Register, pages 33620 - 33622. The Notice of Intent was published in the same issue, pages 33623 - 33624. Comments were to be received by August 21, 2001.

The U.S. Fish and Wildlife Service is re-evaluating their decision with respect to grizzly bear recovery in the Bitterroot Ecosystem (BE), published November 17, 2000 (65 FR 69644). The Record of Decision (ROD) for a Final Environmental Impact Statement (FEIS) published in March 2000, selected the Preferred Alternative. This alternative established a nonessential experimental population of grizzly bears in the BE in east-central Idaho and a portion of western Montana pursuant to section 10(j) of the Endangered Species Act of 1973, as amended. A final rule to implement the preferred alternative was published in the Federal Register on November 17, 2000.

In light of the FWS current recovery needs for grizzly bears in other areas and available resources, as well as the objections of the States that would be affected by the reintroduction of grizzly bears in the BE, the FWS is re-evaluating their prior decision. The FWS proposal is to select the No Action Alternative as the Preferred Alternative. This alternative assumes that current management activities will continue for at least the next 50 years. The overall environmental effects of taking no action would likely result in no recovery of grizzly bears in the BE in the near future, although grizzly bears may begin to repopulate the area in 50 or more years. If grizzly bears did naturally disperse to the BE, they would be protected as threatened under the ESA. If the No Action Alternative is selected, the FWS will remove section 17.84(1) from Title 50 of the Code of Federal Regulations (CFR). The FWS requested public comments on this action. After reviewing the comments provided in this report (Summary of Public Comments, September 2001), the FWS will make a final decision on this proposal. If the No Action Alternative is selected, the FWS will remove the pertinent regulations. This does not mean that the FWS is permanently precluding a reintroduced population of grizzly bears in the Bitterroot Ecosystem.

Comments on the Re-evaluation of the Record of Decision and Removal of Regulations were received from over 28,222 individuals, organizations, and agencies. These comments arrived in over 3,271 letters and e-mail messages. Two petitions were received with 76 signatures. Ten form letters were identified (see Demographic Summary for specific figures). This degree of interest from the public indicates the strong feelings people have regarding grizzly bear recovery in the Bitterroot Ecosystem (BE).

Summary of Public Comments - This analysis of public's responses describes what people have said as completely and directly as possible without assigning weights or serving as a vote-count. The system used to analyze comments is objective, reliable and trackable. All responses to the

proposal have been considered in the production of the summary, including petitions, form letters, individual letters, and electronic e-mail messages. Due to the sheer number of respondents and comments received, the summary of the issues includes trends, themes, and common threads of public opinion. While quantitative information is gathered and is important in assessing attitudes and concerns relating to particular issues, that is only part of the information analyzed. The reasons for people's concerns, preferences and criticisms are reflected in the specific quotes included within each of the specific topics included in the Issues chapter of this summary. An analysis of form letters and petitions is also provided at the end of this chapter.

## **PUBLIC INVOLVEMENT**

The public comment process for an Environmental Impact Statement began in January 1995 and took the following path to the present:

- January 1995 - A Notice of Intent to prepare an EIS was published in the Federal Register. An Interagency team representing the U.S. Fish & Wildlife Service, the U.S. Forest Service, the Montana Department of Fish, Wildlife & Parks, the Idaho Fish & Game Department, and the Nez Perce Tribe was formed to prepare the Draft EIS.
- May 1995 - A Scoping of Issues and Alternatives information brochure was mailed to 1,100 people.
- June 1995 - Formal scoping for issues and alternatives began with Federal Register Notice for a 45-day comment period.
- July 1995 - The public comment period was extended by 30 days until August 21.
- August 1995 - The comment period ended, analysis of public comment began. Over 3,300 written comments were received and analyzed.
- September 1995 - The scoping results were summarized in the document, "Summary of Public Comments on the scoping of issues and alternatives for grizzly bear recovery in the Bitterroot Ecosystem" and the document was distributed.
- August 1996 - April 1997 - Draft EIS written and reviewed by Interagency team (Idaho Fish and Game declined opportunity to review and comment on January 14, 1997).
- June 1997 - Congressional members and staffs, administration and agency personnel, states, counties, tribes, advisory committees/councils, and key individuals and organizations were briefed on the Proposed Special Rule and Draft EIS preferred alternative before Federal Register publication and DEIS release to the public.
- July 1997 - Draft EIS released to public. Public comment period begins July 11 and ran through December 1, 1997 (following two extensions).

- July 1997 - Endangered Species Act, Proposed Rule 10(j) for Establishment of a Nonessential Experimental Population of Grizzly Bears in the Bitterroot Area of Idaho and Montana published in the Federal Register on July 2. Comment period begins July 11 and runs through December 1.
- October 1997 - Public hearings/open houses to gather public comments on the DEIS and Proposed Special Rule held in seven communities on the perimeter of the Bitterroot area. Approximately 1400 people attended these hearings and 293 individuals testified. The Salmon and Hamilton hearings both had more people signed up to speak than time allowed for them all to testify. The dates and locations for the public hearings were as follows:
  - Wednesday, October 1, 1997: Challis, Idaho and Hamilton, Montana
  - Thursday, October 2, 1997: Missoula, Montana and Lewiston, Idaho
  - Friday, October 3, 1997: Boise, Idaho and Helena, Montana
  - Wednesday, October 8, 1997: Salmon, Idaho
- The USFWS held meetings with local community, state leaders, and interest groups in communities around the perimeter of the proposed recovery area.
- The Draft EIS, the Summary, and the Special Rule were published on the USFWS web site.
- December 1 - Public Comment period ended and analysis of public comment began on December 15 running through January 16, 1998 (not including Christmas break).
- February 1998 - "Summary of Public Comments on the Draft Environmental Impact Statement for Grizzly Bear Recovery in the Bitterroot Ecosystem" written and published. Over 24,251 comments were received and analyzed in this summary.
- March 2000 - A Final Environmental Impact Statement was published in the March 9, 2000 Federal Register. The FEIS evaluated a proposal to establish an experimental population rule and reintroduce grizzly bears into the BE. Six alternatives were discussed: (1) Restoration of Grizzly Bears as a Nonessential Experimental Population with Citizen Management (Preferred Alternative); (1A) Restoration of Grizzly Bears as a Nonessential Experimental Population with Service Management; (2) Natural Recovery - The "No-Action" Alternative; (3) No Grizzly Bear Alternative; (4) Restoration of Grizzly Bears as a Threatened Population with Full Protection of the Act and Service Management. There was a 30-day final public review period on the FEIS.
- April 2000 – Final Public review period closes. Over 14,800 public comments received.
- November 2000 - On November 13, the Service signed the Record of Decision (ROD) on the Final EIS and selected the Preferred Alternative (Alternative 1 in the Final EIS) for implementation. A final rule to implement the preferred alternative was published in the Federal Register on November 17, 2000.

- June 2001 - In light of current recovery needs for grizzly bears in other areas and FWS available resources , as well as the objections of the States that would be affected by the reintroduction of grizzly bears in the BE, the USFWS re-evaluated their prior decision. The Service proposed in the June 22, 2001 Federal Register to select the No Action Alternative as the Preferred Alternative and requested public comments on this action. A 60-day comment period was announced on the reconsideration of the Final EIS with comments due by August 21, 2001.
- August 21, 2001 - Public comment period ended.

## **THE PUBLIC COMMENT ANALYSIS PROCESS**

The analysis method used for this project provides a means of categorizing each person's comments into separate subjects and categories, then grouping like categories together so that the public's comments can be more thoroughly examined. It accurately displays public concerns and reasoning about particular issues since each person's own words and phrases are captured. It provides a traceable, visible system for displaying public comments without injecting interpretation or judgment.

Responses were received in the form of letters or postcards, form letters, petitions, and e-mail messages. Each letter, petition, etc. was first given a unique identification number. A coding system was developed to assign demographic information to each respondent and to capture their opinions on issues. The demographic information coded included identifying who the respondent represents, the medium used for responding, the respondent's overall preference for or against the proposal, and where the respondent is from.

Respondents were classified into an "Organization Type" category. See Appendix A-1 for a list of the various types. A demographic summary of respondents is displayed in this chapter, Exhibit 1.

Next, substantive comments related to a particular issue were coded, along with particular reasons or statements for support of, or opposition to, that issue. All substantive comments, accompanied by the appropriate coding for issues, as well as demographic information, were then entered into a computer database for easier sorting and retrieval.

At all times, objectivity and fairness were stressed in this public comment analysis. All respondent's values, perceptions and opinions were captured, including those based on misinformation. The exact words of respondents were used rather than summaries of their statements to insure accuracy and objectivity. All letters were read at least three times by more than one member of the "coding team". A coder first read the entire response to gain an overall understanding of the respondent's viewpoint, and then re-read the response, highlighting and coding substantive comments. To maintain accuracy and consistency, a coding supervisor or another coder would then check the coded response. If questions arose, they would discuss the response and come to agreement on the appropriate coding.

Form letters were grouped to insure that identical coding was used on each letter. Form letters and petition comments were entered into the database with the total number of signatures associated with the particular form or petition.

Comments in technical and complex letters were coded and included in the database. They were also “red-flagged” because of their length and detail. Copies of these letters have been provided to the deciding official for in-depth review. Letters from all government entities have also been provided for in-depth review.

Any respondent’s substantive comments can be found in the database; the original letters and coded copies have been filed in the project file. A cross-reference file lists each respondent alphabetically and by a unique identification number (mail i.d.); thus original letters and coded copies, which are filed numerically, can be located.

The content analysis team consisted of seven people. They were employees of the Forest Service and the U.S. Fish & Wildlife Service. A neutral team leader was contracted by the U.S. Fish & Wildlife Service to oversee the content analysis process and to write the final report. The data entry team consisted of four employees from LC Staffing Temp Service in Missoula, Montana, as well as other members from the content analysis team. In addition, a Forest Service employee provided computer data-base expertise and support. A list of team members is included in Appendix C of this report. The analysis took place in Missoula, Montana beginning August 27 and ending September 13. The team leader and a representative of the U.S. Fish & Wildlife Service wrote the final report from September 13 until publication on September 28.

## **DEMOGRAPHIC SUMMARY OF RESPONDENTS**

This section presents demographic information of the responses received. Information displayed includes *who* responded (individuals, organizations, agencies, etc.), *how* they responded (letter, petition, etc.), *where* they generally responded from, and whether they generally *agree/disagree* with the proposal. Exhibit 1 summarizes whether respondents agree or disagree with the selection of the No-Action alternative. Exhibit 1 also reflects the “unknown” faction of people who were not specific about their agreement or disagreement with the proposal. Exhibit 2 summarizes the ten form letters received, where they were generated (State, foreign countries, and unknown address), which group originated the form letter, and how many signatures for each form letter.

### **WHO RESPONDED**

<b>ORGANIZATION TYPE</b>	<b>Number of Signatures</b>
Business Owners	6
County Government/Representative	8
Environmental interest	120
Individual Citizens	27,971
Congressional/Legislative Representatives	1
City/municipal/local government	1
Industry interest (ranch/timber/mine, etc.)	10
Landowner	19
Professional Scientific Organization	15
Recreational interest	7
State Government/Agencies	2
Tribal Government/Interest	2
Coalition	3
Youth	57
<b>TOTAL</b>	<b>28,222</b>

### **HOW THEY RESPONDED**

<b>RESPONSE TYPE</b>	<b>Number of Signatures</b>
Letter or Postcard (non form letters)	1138
E-mail message or letter (non form letters)	1338
Form Letters (individual modifications)	795
Form Letters (Ten)	24,875
Petitions (Two)	76
<b>TOTAL</b>	<b>28,222</b>



For a summary of where respondents were from geographically, please see Exhibits 1 and 2 at the end of this chapter.

## **FORM LETTERS AND PETITIONS**

### **FORM LETTERS**

As correspondence was received, noticeable trends and similarities became apparent. Ten different form letters were detected totaling 24,875 signatures. All the form letters were in opposition to the “no-action” proposal. Several individuals (795) used the points from the form letter(s) and added their own substantive comments to the basic form letter. Those letters were handled as form letters with modifications. Their concerns are included with those found in the Issues chapter of this report. Following is a summary of the key issues from each of the form letters received.

Form Letter 1 – Defenders of Wildlife – Action Alert (12,549 total): This e-mail form letter was generated from the Defenders of Wildlife action alert web site. Their criticisms of the proposal included the following points:

- “I strongly urge you not to stop the reintroduction of grizzlies to the Bitterroot-Selway wilderness. You are required under the Endangered Species Act to work to save grizzly bears because they are listed under the law as a species threatened with extinction.”
- “If we cannot bring back grizzlies to such a remote and vast wilderness, then where can we do it?”
- “The plan to restore grizzlies was carefully and conscientiously designed by a diverse group of Montana and Idaho citizens. Local citizens would run the program. It is exactly the kind of program that President Bush has said he favors...Please give this plan a chance to work.”

Form Letter 2 – Postcards from Defenders of Wildlife and National Wildlife Federation (8,748 total): The key point of these post cards was:

- “The U.S. Fish and Wildlife Service should reinstate the reintroduction plan for grizzly bear recovery in the Selway-Bitterroot wilderness Area of central Idaho and western Montana, and should reject Interior Secretary Norton’s proposal to take “no action”...I ask that my comments be made part of the public comment record.”

Form Letter 3 – Defenders of Wildlife – Website (36 total): This form letter was also generated from the Defenders of Wildlife web site for “grizaction”. The criticisms of the proposal included the following points:

- “The 15 million-acre Selway-Bitterroot wilderness holds the key to the long-term survival of grizzly bears in the Lower 48 states.”
- “The U.S. Fish and Wildlife Service already has approved the plan, which was subjected to seven years of scientific review, public meetings and literally thousands of public comments.”
- “Local citizens would run the program, and the plan has been endorsed by nearly all the major newspapers in Montana and Idaho.”

- “Funding for this critical project should be a priority in the Bush administration’s budget recommendation.”
- “All options for private funding should be exhausted before the Fish and Wildlife Service cancels the project on fiscal grounds.”
- “Defenders of Wildlife has agreed to compensate landowners for any loss of livestock caused by grizzly bears.”
- “A public opinion poll funded by the Idaho Department of Fish and Game, National Fish and Wildlife Foundation and the University of Idaho in 1995 found that most people on a national (77%), regional (73%) and local (62%) basis supported grizzly reintroduction to the Bitterroot.”

Form Letter 4 – National Wildlife Federation – Action Alert (1,252 total): This form letter was generated from the National Wildlife Federation’s web site. The key points of these letters include:

- “I urge the Fish and Wildlife Service to reinstate citizen management as the preferred alternative for grizzly recovery in central Idaho and western Montana.”
- “I am opposed to Interior Secretary Gale Norton’s proposal to abandon grizzly recovery and to adopt instead an official position of “no action”.”
- “The citizen management plan is an innovative way to make federal wildlife laws work for grizzlies while respecting the interests and concerns of local citizens. Secretary Norton should embrace it as a model of common sense conservation.”
- “The citizen management plan can be a model for wildlife recovery efforts by giving local residents confidence that their concerns will be addressed in decisions about imperiled wildlife where they live.”
- “The Bitterroot Ecosystem has millions of acres of designated wilderness offering an abundance of food for bears and minimal chances for conflicts between bears and people.”
- “Restoring grizzlies to the Bitterroot Ecosystem will help ensure the health and survival of grizzly bears in the lower 48 states where they currently occupy less than 2 percent of their original habitat.”

Form Letter 5 – National Parks and Conservation Association – Action Alert (1,761 total): This form letter was generated by the National Parks Conservation Association on their website. The key points of these letters include:

- “The U.S. Fish and Wildlife Service should reinstate its reintroduction plan for grizzly bear recovery in the Selway-Bitterroot ecosystem of central Idaho and western Montana, and should reject Interior Secretary Norton’s proposal to take “no action.” Grizzly bears are listed as a threatened species under the Endangered Species Act, therefore, the [FWS] is required to work to save grizzly bears – not cater to their extinction.”
- [FWS] Grizzly Bear Recovery Coordinator, Chris Servheen – a leading scientist in the field has stated that the health of wildlife populations – especially large carnivores – in the northern Rockies is critically dependent upon their ability to move from place to place. His expertise recognizes that if we don’t address linkage issues, then grizzly bears will become island populations while their conservation success and future will dramatically drop off.

These scientific facts must be considered and incorporated in any recovery plans for grizzly bears.”

- “Millions of American citizens, and people throughout the world come to our national parks – such as Yellowstone – in hopes of just a glimpse of these majestic and noble wilderness icons. Please do not take that away from us. The plan to restore grizzlies was carefully and conscientiously designed by a diverse group of Montana and Idaho citizens. Local citizens would run the program. It is exactly the kind of program that President Bush has said he favors.”
- “Don’t let the extinction of these great bears be by your doing. It is within your hands to save them, and the American people have continuously voiced their support of reintroduction efforts.”

Form Letter 6 – Predator Conservation Alliance (25 total): This form letter generated by the Predator Conservation Alliance’s web site raises the following issues:

- “Restoring grizzly bears to Idaho is too important to be sacrificed for political reasons. It is a misuse of power to contravene the Endangered Species Act, the scientific community, and the majority of the public. According to a poll contracted by the U.S. Fish and Wildlife Service, 62% of people local to the area and 74% of people nationwide favor grizzly recovery in Idaho.”
- “Reinstate grizzly bears in Idaho under full protections of the Endangered Species Act, as described in Alternative 4 of the Final Environmental Impact Statement. This alternative maximizes the chances for success in restoring grizzlies in Idaho, by including sufficient habitat and protections for grizzly bears. It also prevents giving management authority to a citizens committee appointed by Idaho’s governor who is flatly opposed to grizzly bears.”
- “The [FWS] should live up to its promise to improve grizzly bear protections within and between the Greater Yellowstone, Northern Continental Divide, Cabinet-Yaak, Selkirks, and North Cascades recovery areas. A high priority should be to protect our remaining roadless areas linkage zones, and other areas threatened by the Administration’s energy and logging proposals.”

Form Letter 7 – Sierra Club (449 total): This form letter generated by the Sierra Club organization’s action alert website includes the following issues:

- “I am opposed to the [FWS’s] decision to adopt the “no-action” alternative in the [FEIS] for Grizzly bear introduction in Central Idaho and Western Montana and encourage the Service to adopt Alternative 4 of the FEIS. This alternative would allow Grizzly reintroduction activities to proceed while giving Grizzlies in the area the full protection of the Endangered Species Act and conserving their habitat.”
- “The Service’s attempt to retreat from Grizzly bear introduction carries with it the worst markings of politicized wildlife management decisions. Establishing a healthy Grizzly bear population in the wilderness of Central Idaho and Western Montana is critical to the recovery and persistence of the species and too important an initiative to be sacrificed as a political favor.”
- “In addition to adopting and implementing Alternative 4 of the FEIS, I also encourage the [FWS] to meet its management responsibilities to improve the status of the Grizzly bear within and between the Greater Yellowstone, Northern Continental Divide, Cabinet-Yaak,

Selkirks, and North Cascades recovery areas. The Service should begin by listing the Cabinet-Yaak and Selkirk Grizzly populations as Endangered under the ESA and promptly designating their critical habitat. A high priority should be to protect our remaining roadless areas, and other areas of existing and potential Grizzly habitat vulnerable to logging, off-road vehicle use, mining, and energy development.”

Form Letter 8 – National Wildlife Federation Website (34 total): This form was also generated by the National Wildlife Federation’s website and includes the following points:

- “The grizzly bear is a threatened species, we must work to ensure its population: it’s the law. Restoring grizzlies to this area will help ensure the genetic health and survival of the grizzly species.”
- “The Citizen Management plan is an innovative way to make federal wildlife laws for grizzlies and local people too. The administration should be embracing it as a model of common sense conservation, not caving into the scare tactics of those who would detail any attempt to restore America’s wildlife populations.”
- “The Selway-Bitterroot wilderness area has millions and millions of acres of public land with an abundance of bear foods and few opportunities for conflicts between bear and human.”
- “Far from “extremists”, the architects of this plan are local workers, business people and conservationists committed to balancing the concerns of local citizens with the requirements of the Endangered Species Act”
- “The plan was adopted by the [FWS] after extensive public comment that revealed support for reintroduction under citizen management by majorities of Idaho and Montana residents, as well as broad bipartisan and scientific support. Extending comment periods would amount to nothing more than delay tactics for killing the plan.
- Efforts to reintroduce grizzlies to their historic habitat benefit not only grizzlies, but countless other species.”

Form Letter 9 – Unknown originator – (9 total): This e-mail form letter went to Secretary Gale Norton of the Department of Interior. Key points included:

- “The Citizen Management Plan carefully considers potential conflicts with people. This proposal calls for moving bears that routinely come into conflict with people. The intent of the plan is to restore grizzly bear populations to wilderness areas and remote areas, not to valleys where people live”.
- “The Citizen Management Plan provides direct bear management involvement for local people. Defenders of Wildlife worked collaboratively with the timber industry and organized labor to develop a grizzly reintroduction plan, which the [FWS] has now adopted. The centerpiece of this plan is creation of a citizen management committee that would be responsible for management of the Bitterroot bear population.”
- “Because grizzly bears reproduce so slowly, it may take 50 years or more to establish a healthy population. I strongly urge you to stand by your testimony and support the Citizen Management Plan. This is the most important grizzly bear conservation initiative that the Interior Department and the [FWS] can undertake with the Lower 48 states.”

Form Letter 10 – Unknown originator – (12 total): This form letter went to the USFWS Denver Region. Key points included:

- “This program, which was approved by [FWS] in November 2000 after 7 years of planning, holds the key to the long-term survival of grizzlies in the United States (including Yellowstone) – outside of Alaska.”
- “It is my understanding that Interior Secretary Gale Norton proposed abandoning this plan. As you know, this plan calls for a local ‘citizen committee’ to run the program and oversee the release of bears into the 15 million acre Selway-Bitterroot wilderness beginning 2002. The Bush Administration/Gale Norton have been endorsing local control and collaborative approaches for practically every other issue involving EPA or wildlife. Now they have such a plan – and I understand the Administration and the Interior Secretary want to abandon it.”
- “Other supporters of the already approved plan include: Former Governor Marc Racicot, nearly all the major newspapers in Idaho & Montana, and the logging and milling industries.”

## **PETITIONS**

Two petitions were received totaling 76 signatures. Both petitions were against the “no action” proposal.

Petition One (18 signatures) was mailed to Secretary of the Interior Department, Gale Norton, and postmarked from California. The issues of concern on the petition included:

- “We strongly believe that the grizzly bear should be allowed its old habitat in the Selway-Bitterroot wilderness of Idaho and Montana. We urge you to support the huge undertaking ...being worked out by local people, business people, and conservationists who are all willing to help this significant animal and its recovery under the Endangered Species Act. The administration should accept what these people now want to happen, as they are willing to live with bears.”
- “We believe that the administration should embrace the plan, it is a model of how to restore a species to health and survival. In these wild mountains there is plenty of food for the grizzlies (sic.) and it is scientifically established that the encounters with people do not have to be negative.”

Petition Two (58 signatures) was also mailed to Secretary Gale Norton, and was postmarked from the Environmental Club, Hopkins School, New Haven, Connecticut. The issues of concern on this petition included:

- “...even though the grizzly bear is protected under our nation’s cornerstone environmental law – the Endangered Species Act (ESA) – its habitat is being gobbled up at a record pace by a deadly mix of forest clearcutting and road construction...sprawl and over-development...and unbridled profit-driven exploitation of our natural resources.”
- “...without lots of wild country to forage for food and raise their cubs free from human interference, the grizzly bears face an uncertain future”
- “...the Federal Government – ignoring sound scientific advice – is pushing hard to “delist” the grizzlies and lift the protections they receive under the Endangered Species Act.

- ...if the government proceeds with its reckless plan, the grizzly bear will pay a high price and suffer even more as prime bear habitat around Yellowstone and Glacier National Parks – and in our National Forests – will be opened up for hasty commercial development....once their habitat is gone...the grizzly bears will perish too.”

### **EXHIBIT 1**

#### **Bitterroot NOI to Reevaluate ROD: Summary of All Comments Received 6/21/2001 – 8/21/2001. Tallied by State and Whether They Agree or Disagree with Selection of No Action Alternative**

STATE	“Original” Comments (Non-Form Letters)				Form Letters	TOTAL COMMENTS (Original + Form Letters)		TOTAL COMMENTS that DISAGREE		TOTAL COMMENTS that AGREE	
	Disagree (%)	Agree (%)	Unknown (%)	Total		#	%	#	%	#	%
Alabama	7	0	4	11	115	126	0.5	122	97	0	0
Alaska	11	1	1	13	49	62	0.2	60	97	1	2
Arizona	47	0	1	48	423	471	1.2	470	99.8	0	0
Arkansas	6	0	0	6	52	60	0.2	58	97	0	0
California	278	11	22	311	3010	3321	12.0	3288	99	11	0.3
Colorado	114	9	10	133	746	879	3.2	860	98	9	1
Connecticut	85	0	4	89	260	349	1.3	345	99	0	0
Delaware	3	0	0	3	49	52	0.2	52	100	0	0
Dist. Columbia	10	1	0	11	56	67	0.2	66	98	1	2
Florida	84	3	5	92	1317	1409	5.0	1401	99	0	0
Georgia	23	0	4	27	364	391	1.4	387	99	0	0
Hawaii	4	0	1	5	85	90	0.3	89	99	0	0
Idaho	128 (63)	68 (33)	7 (4)	203	2927	3130	11.1	3055	98	68	2
Illinois	82	1	2	85	827	912	3.3	909	99.7	1	0.1
Indiana	34	1	2	37	358	395	1.4	392	99.2	1	0.3
Iowa	39	5	4	48	130	178	0.6	169	95	5	2.8
Kansas	12	0	0	12	246	258	0.9	258	100	0	0
Kentucky	14	0	1	15	164	179	0.6	178	99.4	0	0
Louisiana	12	0	0	12	97	109	0.4	109	100	0	0
Maine	4	0	1	5	103	108	0.4	107	99	0	0
Maryland	40	0	3	43	448	491	1.8	488	99	0	0
Massachusetts	48	0	4	52	446	498	1.8	494	99	0	0
Michigan	70	0	7	77	527	604	2.2	597	99	0	0
Minnesota	63	1	9	73	312	385	1.4	375	97	1	0.3
Mississippi	10	0	2	12	68	80	0.3	78	98	0	0
Missouri	46	0	2	48	304	352	1.3	350	99	0	0
Montana	213 (49)	190 (44)	29 (7)	432	2532	2964	10.5	2745	93	190	6
Nebraska	9	0	1	10	66	76	0.3	75	99	0	0
Nevada	8	0	1	9	118	127	0.5	126	99	0	0
New Hampshire	13	0	3	16	127	143	0.5	140	98	0	0
New Jersey	50	1	6	57	610	667	2.4	660	99	1	0.1
New Mexico	28	1	2	31	223	254	0.9	251	99	1	0.4
New York	96	1	9	106	1377	1483	5.3	1473	99	1	0.1
North Carolina	29	0	4	33	509	542	2.0	538	99	0	0
North Dakota	3	1	0	4	16	20	.01	19	99	1	0.5
Ohio	50	0	6	56	706	762	2.7	756	99	0	0
Oklahoma	11	0	0	11	89	100	0.4	100	100	0	0
Oregon	85	1	4	90	469	559	2.0	554	99	1	0.2

**Exhibit 1, Continued**

SUMMARY OF PUBLIC COMMENTS  
RE-EVAL OF R.O.D./REMOVAL OF REGULATIONS FOR  
REINTRODUCTION OF GRIZZLY BEARS IN  
BITTERROOT AREAS OF IDAHO AND MONTANA  
SEPTEMBER 2001

STATE	“Original” Comments (Non-Form Letters)				Form Letters	TOTAL COMMENTS (Original + Form Letters)		TOTAL COMMENTS that DISAGREE		TOTAL COMMENTS that AGREE	
	Disagree (%)	Agree (%)	Unknown (%)	Total		#	%	#	%	#	%
Pennsylvania	80	1	2	83	793	876	3.0	873	99.7	1	0.1
Rhode Island	4	0	3	7	55	62	0.2	59	95	0	0
South Carolina	10	1	2	13	139	152	0.5	149	98	1	0.7
South Dakota	4	0	2	6	28	34	0.1	32	94	0	0
Tennessee	21	1	1	23	218	241	0.9	239	99	1	0.4
Texas	76	3	6	85	887	972	3.5	963	99	3	0.3
Utah	38	1	1	40	164	204	0.7	202	99	1	0.5
Vermont	11	0	1	12	98	110	0.4	109	99	0	0
Virginia	70	2	8	80	531	611	2.2	601	98	2	0.3
Washington	104	5	5	114	801	915	3.3	905	99	5	0.5
West Virginia	5	0	2	7	86	93	0.3	91	98	0	0
Wisconsin	45	2	2	49	430	479	1.7	475	99	2	0.4
Wyoming	44	0	4	48	45	93	0.3	89	96	0	0
Unknown	371	50	32	453	218	671	2.4	589	88	50	7
Canada					24	24		24	100	0	0
United Kingdom					6	6		6	100	0	0
Australia					5	5		5	100	0	0
Belgium					2	2		2	100	0	0
China					1	1		1	100	0	0
Germany					1	1		1	100	0	0
Ireland					1	1		1	100	0	0
Israel					2	2		2	100	0	0
Italy					1	1		1	100	0	0
Indonesia					1	1		1	100	0	0
Malaysia					1	1		1	100	0	0
Mexico					3	3		3	100	0	0
New Zealand					1	1		1	100	0	0
Norway					1	1		1	100	0	0
Puerto Rico					2	2		2	100	0	0
Singapore					2	2		2	100	0	0
South Africa					1	1		1	100	0	0
Sweden					1	1		1	100	0	0
Virgin Islands			1	1	1	2		2	100	0	0
TOTAL	2,752 (82%)	362 (11%)	233 (7%)	3347 (12%)	24875 (88%)	28,222		27627	97.9	362	1.3

**Summary Statistics:**

**Total number of comments received = 28,222**

Original Comments (Non-Form Letters) = 3,347 (12% of total)

Form Letters and Postcards = 24,875 (88% of total)

**Summary of Response Type (Agree or Disagree with Federal Register Proposal to Select No Action Alternative):**

Original Comment Letter (Total = 3,347):

Agree = 362 (11%)

Disagree = 2,752 (82%)



Agree = 0 (0%)

\*TOTAL COMMENTS (Original + Form Letters = 28,222):

Agree = 362 (1%)

Disagree = 27,627 (98%)

Unknown = 233 (1%)

Idaho: Original Comments = 203 (33% Agree, 63% Disagree, 4% Unknown)

Form Letters = 2,927 (100% Disagree)

Total Comments (original + form letters) = 3,130 (11.1% of all comments received)

Agree = 68 (2%); Disagree = 3,055 (98%); Unknown = 7 (0.2%)

Montana: Original Comments = 432 (44% Agree, 49% Disagree, 7% Unknown)

Form Letters = 2,532 (100% Disagree)

Total Comments (original + form letters) = 2,964 (10.5% of all comments received)

Agree = 190 (6%); Disagree = 2,745 (93%); Unknown = 29 (1%)

## EXHIBIT 2

### **Bitterroot NOI to Reevaluate ROD: Comment Period 6/21/2001 – 8/21/2001 Summary Count of Form Letters by State**

STATE	FORM LETTER NUMBER										TOTAL
	1	2	3	4	5	6	7	8	9	10	
Alabama	66	18	0	6	19	0	5	1	0	0	115
Alaska	24	15	0	5	5	0	0	0	0	0	49
Arizona	279	66	1	23	45	0	9	0	0	0	423
Arkansas	30	14	0	2	5	0	0	1	0	0	52
California	2068	502	3	127	235	3	71	1	0	0	3010
Colorado	521	96	1	48	55	0	19	6	0	0	746
Connecticut	157	52	0	12	35	0	4	0	0	0	260
Delaware	25	14	0	4	1	0	5	0	0	0	49
Dist Columbia	29	12	0	7	7	0	1	0	0	0	56
Florida	954	149	2	68	122	0	21	1	0	0	1317
Georgia	252	49	0	24	24	0	14	1	0	0	364
Hawaii	70	10	0	1	3	0	1	0	0	0	85
Idaho	63	2846	0	4	12	0	2	0	0	0	2927
Illinois	551	124	1	51	86	0	12	2	0	0	827
Indiana	246	55	0	16	35	0	6	0	0	0	358
Iowa	84	24	0	1	14	0	7	0	0	0	130
Kansas	174	28	0	13	29	0	2	0	0	0	246
Kentucky	108	26	1	9	18	0	2	0	0	0	164
Louisiana	65	15	2	4	10	0	1	0	0	0	97
Maine	68	16	0	4	12	0	3	0	0	0	103
Maryland	269	75	0	51	43	0	9	1	0	0	448
Massachusetts	277	83	0	43	35	0	7	0	1	0	446
Michigan	303	118	0	51	45	0	10	0	0	0	527
Minnesota	174	77	0	21	27	0	13	0	0	0	312
Mississippi	44	10	0	2	11	0	1	0	0	0	68
Missouri	181	56	0	16	43	0	8	0	0	0	304
Montana	78	2422	0	10	15	2	5	0	0	0	2532
Nebraska	33	19	0	9	5	0	0	0	0	0	66
Nevada	61	34	0	5	12	1	5	0	0	0	118
New Hampshire	84	20	1	7	13	0	2	0	0	0	127
New Jersey	382	120	0	23	60	0	22	1	1	1	610
New Mexico	144	47	1	8	18	0	5	0	0	0	223
New York	935	232	1	64	117	2	23	2	1	0	1377
North Carolina	225	200	0	33	41	0	9	1	0	0	509
North Dakota	6	8	0	1	0	0	1	0	0	0	16
Ohio	446	134	0	50	59	1	12	4	0	0	706
Oklahoma	60	8	0	2	15	0	4	0	0	0	89
Oregon	284	104	1	28	35	1	15	1	0	0	469
Pennsylvania	474	139	1	63	90	1	13	1	0	11	793
Rhode Island	31	11	0	7	4	0	2	0	0	0	55
South Carolina	84	27	0	9	15	0	4	0	0	0	139
South Dakota	12	6	0	3	2	0	5	0	0	0	28
Exhibit 2 continued next page											

SUMMARY OF PUBLIC COMMENTS  
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STATE	FORM LETTER NUMBER										TOTAL
	1	2	3	4	5	6	7	8	9	10	
Tennessee	141	23	0	14	37	0	3	0	0	0	218
Texas	627	82	1	65	86	0	23	3	0	0	887
Utah	107	37	0	7	10	0	2	1	0	0	164
Vermont	60	31	0	4	2	0	1	0	0	0	98
Virginia	309	90	1	78	41	0	11	1	0	0	531
Washington	396	300	1	40	38	4	21	1	0	0	801
West Virginia	48	14	1	9	11	1	2	0	0	0	86
Wisconsin	261	80	0	26	45	0	16	2	0	0	430
Wyoming	16	10	0	4	7	5	3	0	0	0	45
Unknown	113	0	16	66	6	4	6	1	6	0	218
Canada	20	0	0	3	0	0	0	1	0	0	24
United Kingdom	5	0	0	1	0	0	0	0	0	0	6
Australia	4	0	0	0	1	0	0	0	0	0	5
Belgium	2	0	0	0	0	0	0	0	0	0	2
China	1	0	0	0	0	0	0	0	0	0	1
Germany	1	0	0	0	0	0	0	0	0	0	1
Ireland	1	0	0	0	0	0	0	0	0	0	1
Israel	2	0	0	0	0	0	0	0	0	0	2
Italy	1	0	0	0	0	0	0	0	0	0	1
Indonesia	1	0	0	0	0	0	0	0	0	0	1
Malasia	1	0	0	0	0	0	0	0	0	0	1
Mexico	3	0	0	0	0	0	0	0	0	0	3
New Zealand	1	0	0	0	0	0	0	0	0	0	1
Norway	1	0	0	0	0	0	0	0	0	0	1
Puerto Rico	2	0	0	0	0	0	0	0	0	0	2
Singapore	2	0	0	0	0	0	0	0	0	0	2
South Africa	1	0	0	0	0	0	0	0	0	0	1
Sweden	1	0	0	0	0	0	0	0	0	0	1
Virgin Islands	0	0	0	0	0	0	1	0	0	0	1
<b>TOTAL</b>	12549	8,748	36	1,252	1,761	25	449	34	9	12	24,875

Summary Statistics:

Total Number of Form Letters = 24,875

Number of form letters that Disagreed with the selection of the No Action alternative = 24,875 (100%)

Number of Form Letters from Idaho = 2,927

Number of form letters from Montana = 2,532

Form Letters Identified by Originator:

Form Letter 1: Defenders of Wildlife – Action Alert

Form Letter 2: Postcards from Defenders of Wildlife and National Wildlife Federation

Form Letter 3: Defenders of Wildlife - Website

Form Letter 4: National Wildlife Federation – Action Alert

Form Letter 5: National Parks and Conservation Association – Action Alert

Form Letter 6: Predator Conservation Alliance

Form Letter 7: Sierra Club

Form Letter 8: National Wildlife Federation - Website

Form Letter 9: Unknown (e-mail to Department of Interior)

Form Letter 10: Unknown (letter to USFWS Denver Region)